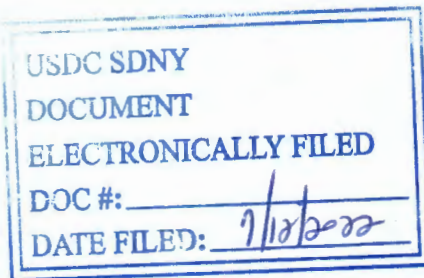


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June 30, 2022

7/12/22

**BY ECF**

Hon. Colleen McMahon  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Mr. SHEERAN's bail conditions  
ARE amended to the extent  
the drug testing requirement  
is removed.

**Re: United States v. Jeremy Sheeran, No. 20 Cr. 521 (CM)**

Dear Judge McMahon:

We represent defendant Jeremy Sheeran in the above-captioned case. We write to respectfully request a modification of Mr. Sheeran's conditions of release to remove the drug testing requirement. (See ECF Doc. 20.)

Although Mr. Sheeran has been on pretrial release for nearly two years, he has never encountered any substance abuse concerns since his arrest on October 1, 2022. Nonetheless, this drug testing condition has recently imposed extremely burdensome supervision requirements for Mr. Sheeran. Specifically, Mr. Sheeran recently moved to New Jersey from New York. Unlike the S.D.N.Y. Pretrial Services Office ("PTS"), to enforce the drug testing requirement, New Jersey PTS requires Mr. Sheeran to report to PTS by phone every evening, and travel to the PTS Office (over 20 miles away from his home) for random drug testing regularly. Just in the last week, PTS has required him to submit to drug testing on two separate occasions.

Because the charges against Mr. Sheeran do not relate to controlled substances, he has no significant history of controlled substance abuse, and he has had no violations or issues related to controlled substances since his release, we respectfully request that the Court modify Mr. Sheeran's bail conditions to remove the drug testing requirement. We have conferred with Pretrial Services and counsel for the government, both of whom take no position on this request.

Respectfully submitted,

/s/ IH

Henry E. Mazurek

Ilana Haramati

Meister Seelig Fein LLP

*Counsel for Defendant Jeremy Sheeran*

cc: Counsel of Record (via ECF)